

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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ALLGOOD ENTERTAINMENT, INC., and
ALLGOOD CONCERTS, LLC,

Civil Action No.: 1:09-cv-05377-HB

Plaintiffs,
vs.

ECF Case

JOHN BRANCA and JOHN MCCLAIN as
Special Administrators of the ESTATE OF
MICHAEL JACKSON, DILEO
ENTERTAINMENT AND TOURING, INC.,
FRANK DILEO, ANSCHUTZ
ENTERTAINMENT GROUP, AEG LIVE,
LLC, and AEG LIVE NY, LLC,

Defendants.
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**NOTICE OF MOTION FOR SUMMARY JUDGMENT BY DEFENDANTS
JOHN BRANCA AND JOHN MCCLAIN AS SPECIAL ADMINISTRATORS OF
THE ESTATE OF MICHAEL JACKSON**

Howard Weitzman (*pro hac vice*)
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*Attorneys for Defendants John Branca and John McClain
as Special Administrators of the Estate of Michael Jackson*

PLEASE TAKE NOTICE that, upon this Notice of Motion, the accompanying Memorandum of Law (jointly filed with the Dileo Defendants pursuant to paragraph 4(D) of this Court's Individual Practices), the Declaration of Jonathan P. Steinsapir and Exhibits annexed thereto, and the Local Rule 56.1 Statement of Undisputed Facts, Defendants John Branca and John McClain as Special Administrators to the Estate of Michael Jackson (referred to hereafter as "the Estate of Michael Jackson"), by their undersigned counsel, will move this Court, before the Honorable Harold Baer, Jr., of the United States District Court for the Southern District of New York, at Courtroom 23B of the United States Courthouse, 500 Pearl Street, New York, New York, 10017, on August, 1, 2010, for an Order pursuant to Rule 56 of the Federal Rules of Civil Procedure granting summary judgment in favor of the Estate of Michael Jackson, dismissing Plaintiffs' Complaint in its entirety, and for such other and further relief as the Court deems just and proper, including reasonable costs and attorneys' fees.

PLEASE TAKE FURTHER NOTICE that Plaintiffs shall serve and file any Opposition to the motion on or before July 23, 2010, fourteen (14) days from the service and filing of this Notice of Motion, and that the Estate of Michael Jackson shall serve and file any Reply on or before July 30, 2010, seven (7) days from the service and filing of any Opposition.

Dated: July 9, 2010

Respectfully Submitted:

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By: /s/Howard Weitzman

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